

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1347822-000

Total Deleted Page(s) = 163

Page 4 ~ Referral/Direct;  
Page 5 ~ Referral/Direct;  
Page 6 ~ Duplicate;  
Page 8 ~ Duplicate;  
Page 25 ~ b6; b7C;  
Page 42 ~ b6; b7C;  
Page 43 ~ b6; b7C;  
Page 51 ~ Duplicate;  
Page 57 ~ Duplicate;  
Page 58 ~ Duplicate;  
Page 59 ~ Duplicate;  
Page 60 ~ Duplicate;  
Page 61 ~ Duplicate;  
Page 63 ~ Referral/Direct;  
Page 64 ~ Referral/Direct;  
Page 65 ~ Referral/Direct;  
Page 66 ~ Referral/Direct;  
Page 67 ~ Referral/Direct;  
Page 68 ~ Referral/Direct;  
Page 69 ~ Referral/Direct;  
Page 70 ~ Referral/Direct;  
Page 71 ~ Referral/Direct;  
Page 72 ~ Referral/Direct;  
Page 73 ~ Referral/Direct;  
Page 74 ~ Referral/Direct;  
Page 75 ~ Referral/Direct;  
Page 76 ~ Referral/Direct;  
Page 77 ~ Duplicate;  
Page 78 ~ Referral/Direct;  
Page 79 ~ Duplicate;  
Page 80 ~ Duplicate;  
Page 81 ~ Duplicate;  
Page 82 ~ Duplicate;  
Page 83 ~ Referral/Direct;  
Page 84 ~ Referral/Direct;  
Page 85 ~ Referral/Direct;  
Page 86 ~ Referral/Direct;  
Page 87 ~ Referral/Direct;  
Page 88 ~ Referral/Direct;  
Page 89 ~ Referral/Direct;  
Page 90 ~ Referral/Direct;  
Page 91 ~ Referral/Direct;  
Page 92 ~ Referral/Direct;  
Page 93 ~ Referral/Direct;  
Page 94 ~ Referral/Direct;  
Page 95 ~ Referral/Direct;  
Page 96 ~ Referral/Direct;  
Page 97 ~ Referral/Direct;  
Page 98 ~ Referral/Direct;  
Page 99 ~ Referral/Direct;  
Page 100 ~ Referral/Direct;  
Page 101 ~ Referral/Direct;  
Page 102 ~ Referral/Direct;  
Page 103 ~ Referral/Direct;  
Page 104 ~ Referral/Direct;  
Page 105 ~ Referral/Direct;  
Page 106 ~ Referral/Direct;  
Page 107 ~ Referral/Direct;  
Page 108 ~ Referral/Direct;  
Page 109 ~ Referral/Direct;  
Page 110 ~ Referral/Direct;  
Page 111 ~ Referral/Direct;  
Page 112 ~ Referral/Direct;  
Page 113 ~ Referral/Direct;  
Page 114 ~ Referral/Direct;  
Page 115 ~ Referral/Direct;  
Page 116 ~ Referral/Direct;

Page 117 ~ Referral/Direct;  
Page 118 ~ Referral/Direct;  
Page 119 ~ Referral/Direct;  
Page 120 ~ Referral/Direct;  
Page 121 ~ Referral/Direct;  
Page 122 ~ Referral/Direct;  
Page 123 ~ Referral/Direct;  
Page 124 ~ Referral/Direct;  
Page 125 ~ Referral/Direct;  
Page 126 ~ Referral/Direct;  
Page 127 ~ Referral/Direct;  
Page 128 ~ Referral/Direct;  
Page 129 ~ Referral/Direct;  
Page 130 ~ Referral/Direct;  
Page 131 ~ Referral/Direct;  
Page 132 ~ Referral/Direct;  
Page 133 ~ Referral/Direct;  
Page 134 ~ Referral/Direct;  
Page 135 ~ Referral/Direct;  
Page 136 ~ Referral/Direct;  
Page 137 ~ Referral/Direct;  
Page 138 ~ Referral/Direct;  
Page 139 ~ Referral/Direct;  
Page 140 ~ Referral/Direct;  
Page 141 ~ Referral/Direct;  
Page 142 ~ Referral/Direct;  
Page 143 ~ Referral/Direct;  
Page 144 ~ Referral/Direct;  
Page 145 ~ Referral/Direct;  
Page 146 ~ Referral/Direct;  
Page 147 ~ Referral/Direct;  
Page 148 ~ Referral/Direct;  
Page 149 ~ Referral/Direct;  
Page 150 ~ Referral/Direct;  
Page 151 ~ Referral/Direct;  
Page 152 ~ Referral/Direct;  
Page 153 ~ Referral/Direct;  
Page 154 ~ Referral/Direct;  
Page 155 ~ Referral/Direct;  
Page 156 ~ Referral/Direct;  
Page 157 ~ Referral/Direct;  
Page 158 ~ Referral/Direct;  
Page 159 ~ Referral/Direct;  
Page 160 ~ Referral/Direct;  
Page 161 ~ Referral/Direct;  
Page 162 ~ Referral/Direct;  
Page 163 ~ Referral/Direct;  
Page 164 ~ Referral/Direct;  
Page 165 ~ Referral/Direct;  
Page 166 ~ Referral/Direct;  
Page 167 ~ Referral/Direct;  
Page 168 ~ Referral/Direct;  
Page 169 ~ Referral/Direct;  
Page 170 ~ Duplicate;  
Page 171 ~ Duplicate;  
Page 172 ~ Duplicate;  
Page 173 ~ Duplicate;  
Page 175 ~ Duplicate;  
Page 180 ~ Duplicate;  
Page 181 ~ Duplicate;  
Page 184 ~ Duplicate;  
Page 185 ~ Duplicate;  
Page 188 ~ Duplicate;  
Page 189 ~ Duplicate;  
Page 190 ~ Referral/Consult;  
Page 191 ~ Referral/Consult;  
Page 192 ~ Referral/Consult;  
Page 193 ~ Duplicate;  
Page 194 ~ Duplicate;  
Page 195 ~ Duplicate;  
Page 196 ~ Referral/Consult;  
Page 197 ~ Referral/Consult;  
Page 198 ~ Referral/Consult;

Page 199 ~ Duplicate;  
Page 200 ~ Duplicate;  
Page 201 ~ Duplicate;  
Page 202 ~ Referral/Consult;  
Page 203 ~ Referral/Consult;  
Page 204 ~ Referral/Consult;  
Page 205 ~ Referral/Consult;  
Page 206 ~ Referral/Consult;  
Page 207 ~ Duplicate;  
Page 208 ~ Duplicate;  
Page 209 ~ Duplicate;  
Page 210 ~ Duplicate;  
Page 211 ~ Duplicate;  
Page 213 ~ Referral/Consult;  
Page 214 ~ Referral/Consult;  
Page 215 ~ Referral/Consult;  
Page 216 ~ Referral/Consult;  
Page 217 ~ Duplicate;  
Page 218 ~ Duplicate;  
Page 219 ~ Duplicate;  
Page 220 ~ Duplicate;  
Page 223 ~ Duplicate;  
Page 224 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXX  
X Deleted Page(s) X  
X No Duplication Fee X  
X For this Page X  
XXXXXXXXXXXXXXXXXXXXX

# Memorandum



To : SAC, WMFO (74-330) (P) (C-2)

Date 8/30/88

From : SA [redacted]

Subject :

[redacted]

OO:WMFO

The following sub files have been created to standardize and administrate the captioned investigative matter. Additional sub files may be created as the need arises.

A copy of this memorandum should be maintained as the top serial in each sub file.

SUB D: News articles and NEXIS printouts

Testimony and other statements of or relating to:

SUB G:

SUB H:

SUB I:

SUB J:

SUB K:

[redacted]

⑨-Washington Field (74-330)

[redacted]

(9)

Maintain as Top Serial  
Do Not Cancelize

74-330-MAIN

[redacted]

[redacted]

b6  
b7C

b6  
b7C

b6  
b7C

74-330-11

SEARCHED	INDEXED
SERIAL	
MAY 18 1988	
FBI - WASH. FIE	

b6  
b7C

et al

b6  
b7C

(File No.) 74-330

[illegible]



Field File No.

74-330 -2

Serial # of Originating Document

OO and File No.

Date Received

From

(Name of Contributor)

(Address of Contributor)

(City and State)

By

(Name of Special Agent)

To Be Returned ☐ Yes ☐ No Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules of Criminal Procedure ☐ Yes ☐ No

Title:

[Redacted]

et al

PERJURY

OO: WMFO

Reference:

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

[Redacted]

9/20/88



[redacted]

[redacted]

[redacted]

b6  
b7C

[redacted]

atty,

[redacted]

9/20/88

b6  
b7C

① [redacted] - prior proc atty; friend of [redacted]  
[redacted] I tried to use to get [redacted] to  
talk re DOJ [redacted] pressure on US T<sup>S</sup> the Doctors,  
Feels that [redacted] may have told her re pressure, as he did the Doctors,  
re that's what he believed at time.

② [redacted] dep't refused to pressure; but he  
had wrong case (eg referred to shareholder's  
cmttee). Once realized his mistake,  
recanted his testimony. Once [redacted] learned  
of this, called [redacted] atty re discip. Whif.  
not re [redacted] to contact [redacted] But [redacted] did,  
+ [redacted] realized his mistake +  
issued an affidavit recanting.

b6  
b7C

③ [redacted] called AVSA [redacted] SONY,  
why rep [redacted] at depo. [redacted] advised that  
had been a mistake, had spoken to [redacted]  
atty, + why despatch [redacted] spoke w/.

[redacted]

Field File No. \_\_\_\_\_

Serial # of Originating Document \_\_\_\_\_

OO and File No. WF 74-330-2

Date Received \_\_\_\_\_

From \_\_\_\_\_

(NAME OF CONTRIBUTOR)

\_\_\_\_\_  
(ADDRESS OF CONTRIBUTOR)

\_\_\_\_\_  
(CITY AND STATE)

By \_\_\_\_\_

(NAME OF SPECIAL AGENT)

To Be Returned ☐ Yes ☒ No Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to  
Rule 6(e), Federal Rules of Criminal Procedure

☐ Yes ☒ No

Title:

                    , et al  
Possible Perjury  
OO: WMFO

Reference: \_\_\_\_\_

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

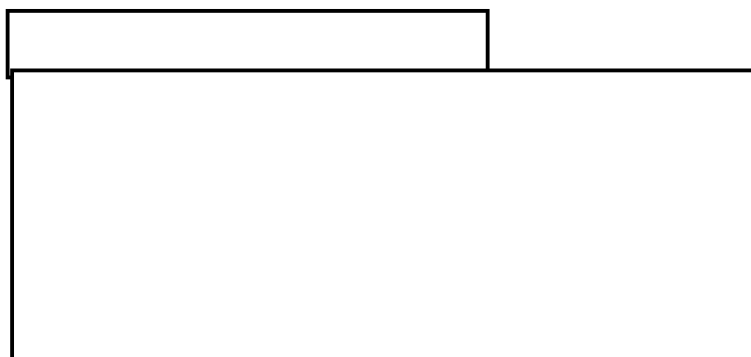
                                    

10/19/88

b6  
b7C

74-330-1A 2

10/19/88

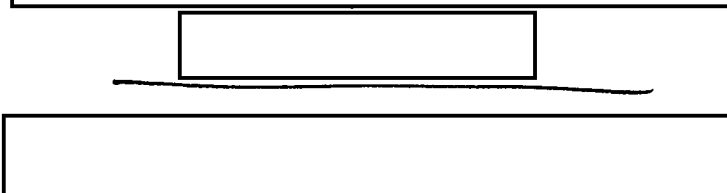


RA [redacted]

b6  
b7C

etc.  
(see card).

6N.



b6  
b7C

2/85

As [redacted] - [redacted]  
Rep/Proper in Wn to be kept  
already of ongoing cases. Wn has some  
operational authority, since he is also the  
[redacted] EOUST as well as Wn.

DOJ Reps gave more flexibility to [redacted]  
Dn EOUST [redacted] super cases than in  
EOUS A.

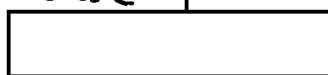
Wn's recall [redacted] interf in any  
case. Reacted to things that happened,  
but doesn't recall any incidents where  
[redacted] directly interfered.  
But admits, he did interfere.

b6  
b7C

Re contact w/ [redacted], re INSLAW,  
just of all, [redacted] was not involved. [redacted]  
called re what was it about; Pkg of  
docs re the I br was sent over  
to EOUST. Sure that didn't know  
anything about case before that.

b6  
b7C

Talked to [redacted] debtors'  
counsel. [redacted] reported back to EO; was  
sure whether spoke to [redacted] or someone  
else. [redacted] either [redacted]



No further inv. w/ case until [redacted]  
of action by [redacted]

b6  
b7C

impose curfew order, because DOJ was both a creditor & a TEE. Upset at seeing this, hee was a criticism of his office. Told [ ] & his staff that was no problem. Ordered staff not to release non-pub. info. [ ] asked for a narrow, precise order. That order made it very clear as to who could see the I file.

That was end of involvement re I matter until civil suit came up.

Re [ ] issue: [ ] was mentor in - in; helped get feel in being US TEE. Spoke to each other periodically & regularly.

Recalls telcall, that [ ] indicated that [ ] directly called [ ] Curves. [ ] re [ ] coming to Wash to do something re I. I may have misunderstood, but thought that [ ] was do something at Main J. Thought it was S trying to carry over by having [ ] available.

But since both DOJ civil dir & US TEEs knew how to ~~find~~ all motives to avoid a decision, couldn't understand purpose of [ ] coming to Wash. Also unusual because I was not a big case - no unusual admin problems; one of many Chr II cases.

Doesn't ever remember [ ] ever discussing [ ] w/ him. Never brought it to [ ] attention. Never heard anything else re [ ] coming.

~~NO~~ No recollection that [ ] said that [ ]  
being sent to court I, [ ] was  
not going to allow to happen. Both  
felt very strongly, but it did not come  
to pass. ~~Had~~ Had it come to fruition, we  
would have taken issue to A-6. ~~and~~

b6  
b7C

[ ] even suggests resigning over issue  
he wanted to preserve integrity of  
programming.

~~From~~  
Covers w/ [ ] re [ ] was before  
prob order was issued.

b6  
b7C

From Spring 85 to depositions in  
3 & 4 / 87, had no contact re I.

Deposed 3/23/87. I atty [ ]  
served [ ] w/ 2<sup>d</sup> ~~subpoena~~ subpoena. Said was a  
~~subpoena~~ <sup>threatened</sup> ~~subpoena~~ <sup>not</sup> ~~subpoena~~ <sup>subpoena</sup>  
[ ] called [ ], said was subpoenaed.  
again & was a copy of inter. [ ] said  
was giving another depo, & said we  
get back to me.

b6  
b7C

[ ] & [ ] said [ ]  
testimony different from [ ]. No substantial  
cover w/ [ ] until he read <sup>me</sup> his  
transcript verbatim when I called him.

b6  
b7C

As [ ] read his transcript over  
phone, [ ] told him that's not what  
happened. No one [ ]  
[ ] would tell [ ] what incense was.  
Recalls that [ ] wanted to read  
depo exactly. Recalls testimony re  
"IRS measure to convert." Told  
[ ] that "that's not the way it happened"

b6  
b7C

ul notes that nation to cover is a daily occurrence in my work. Covering is a judicial decision; but not to cover occurs all the time

When told [ ] that was mistaken, [ ] agreed. There was other testimony that was not accurate re I [ ] showed [ ] that had it confused w/ ~~the~~ VPI case. May have discussed [ ] need to cover. Q may have come up re whether [ ] sd cover.

[ ] specif states that ~~he~~ called [ ] to lobby & handle re charges needed.

Doesn't recall talking to [ ] any further re I.

~~He~~ [ ] had confused VPI w/ I, hee VPI was a big case, quickly done w/in 12 mos. Near beg of case, a ~~lot~~ <sup>att</sup> atty said that "was 11s den & reorg," so let let's liquidate." [ ] cited this to [ ] as example where Tees did not side w/ Govt.

Believes that VPI filing was around same time as I. Handled personally, May have spoken w/ IRS atty re conversion, but never got any pressure.

did not have freq disc. w/ Ass't Tees re I.

[ ]

[ ] was terribly upset re how  
being treated by [ ] [ ] wanted to get  
reborn in NY employment.

b6  
b7C

Does not recall telling [ ] that  
EO was obsessed w/ I.

[ ] was getting strange. Felt ~~that~~ was  
cutoff from many EO activities, phone  
tapped, etc.

The notes shown in I file, in  
response to attempts to get  
information for [ ] doesn't recall  
speaking to [ ] during I.

b6  
b7C

Field File No. \_\_\_\_\_

Serial # of Originating Document

74-330-(3)

OO and File No. \_\_\_\_\_

Date Received \_\_\_\_\_

From \_\_\_\_\_

(Name of Contributor)

\_\_\_\_\_  
(Address of Contributor)

\_\_\_\_\_  
(City and State)

By \_\_\_\_\_

(Name of Special Agent)

To Be Returned ☐ Yes ☒ No Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules  
of Criminal Procedure ☐ Yes ☐ No

Title: \_\_\_\_\_

Reference: \_\_\_\_\_

(Communication Enclosing Material)

Description: \_\_\_\_\_

Original notes re interview of

10/20/88

b6  
b7C

b6  
b7C



10/20/88

[redacted]

b6  
b7C

Knows [redacted] since [redacted] came up [redacted]  
[redacted]  
[redacted]

sees 2-3 x/yr. @ prof functions. No social relship outside.

Has not had conv w/ [redacted] re pressures to covert cases; no pressure re intakes w/ EOUST.

b6  
b7C

Has known [redacted] since were employed at [redacted]. Has dropped in 2-3 times for lunch. At one lunch, [redacted] and [redacted] attended. Has no recollection that subj of I ever came up.

b6  
b7C

Recalls that [redacted] sat on couch talking while [redacted] finished up. personally. Has no idea re what they talked about. [redacted] did have probe w/ his superiors. Did make known to someone his concerns, re probe.

Field File No. WF 74-330-1A-4

Serial # of Originating Document \_\_\_\_\_

OO and File No. \_\_\_\_\_

Date Received \_\_\_\_\_

From \_\_\_\_\_  
(NAME OF CONTRIBUTOR)

\_\_\_\_\_  
(ADDRESS OF CONTRIBUTOR)

By SA   
(NAME OF SPECIAL AGENT)

To Be Returned ☐ Yes ☐ No Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to  
Rule 6(e), Federal Rules of Criminal Procedure  
☐ Yes ☐ No

Title: , et al  
POSSIBLE PERJURY  
OO: WM FO

Reference: \_\_\_\_\_  
(Communication Enclosing Material)

Description: ☒ Original notes re interview of

b6  
b7C

10/20/88

b6  
b7C

10/20/88 ✓  
[redacted]  
%a Tues before dep, [redacted] rec'd call from [redacted] chrs. [redacted] was asked to give dep testimony in I case. Called [redacted] her one of 2 by attys in USA of. Rec'd auth to rep [redacted] her being repres as her ee of DOJ.

Hadn't rec'd adeq CFK stnd from I attys. Called ED US Tee of, & rec'd perm to make [redacted] available.

~~So~~ Interview [redacted] briefly. Rec'd genl overview of I.

I atty [redacted] atty named [redacted] [redacted] gave his dep testimony & was relatively quick. Recalls [redacted] saying that was asked to send [redacted] to Wash, & thought w'd result to [redacted] to send [redacted] to Wash.

Next ~~day~~ <sup>morning</sup>, rec'd call from DOJ atty [redacted] [redacted] said [redacted] testimony was wrong, & DOJ concerned that sd get something to [redacted] to indicate the error. Then spoke w/ [redacted] on phone. [redacted] stated his testimony wrong, & wanted to correct his error. ~~He advised~~

[redacted] was sched to receive trans that morning. [redacted] wd then send it to [redacted]

[redacted] ~~that~~ [redacted] met w/ [redacted] in at least 2 hrs & asked him what happened. [redacted] said he called [redacted] right after dep, (reting [redacted] call from several days prior) & [redacted] told him re his testimony. [redacted] said

b6  
b7C

to [ ] "think about that, that  
isn't I." Recalls [ ] said he read  
portraits of Trauser to [ ] then  
convinced he made a mistake.

b6  
b7C

[ ] then went through the entire  
transcript & reviewed ~~every~~ all [ ] testin'.  
Affid stated that everything [ ] <sup>said</sup> was  
true to [ ] ~~to~~ knowl; but after further  
reflec & speaking to [ ] he now realizes  
that he had I confused w/ VPI case.  
[ ] send signed affid to [ ]

b6  
b7C

~~Had~~ no further contact w/ I until  
[ ] was deposed again. This depo took  
place in [ ] This ~~depo~~  
~~transcript~~ was reviewed by [ ]  
w/ no changes.

b6  
b7C

Later, [ ] repres [ ] also as a  
depo

After "Bernard" article, rec'd call  
from [ ] on behalf of I. Wanted  
to talk to [ ] again. Sensed not  
anxious to accuse [ ] of perjury. [ ]  
made an affic req for repres, or  
cure w/ I req to interview him  
but not sure what happened to  
request.

b6  
b7C

[ ] reiterates that when [ ] called re  
[ ] discop in testin' [ ] did not sugges  
what testin sb. Rather, concerned b/c of  
thing, it leaves coming up unred  
thereafter, [ ] sugges a letter, but  
[ ] decided to go w/ affid.

b6  
b7C

+ signed

Field File No.

WF 74-330-1A-5

Serial # of Originating Document

OO and File No.

Date Received

From

(Name of Contributor)

(Address of Contributor)

(City and State)

By

SA

(Name of Special Agent)

To Be Returned ☐ Yes ☐ No Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules of Criminal Procedure ☐ Yes ☐ No

Title:

POSSIBLE PERJURY  
OO: WMFO et al

Reference:

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

with xerox of envelope attached. 10/21/88

b6  
b7C

10/21/88

?

[redacted]  
[redacted]  
[redacted] Has known [redacted] since 1976, as a [redacted] Used [redacted] rolls for pol contributions, + assumed [redacted] knew her from that. [redacted]

b6  
b7C

3/18/87 - msg on ans mach from [redacted] (NY civil is can't make (L) phone calls). Planned to go to [redacted] [redacted] was [redacted] ally-friend who she req to call [redacted] + have him call her.

b6  
b7C

He ~~said~~ called, + # know [redacted] [redacted] wanted to talk w/ [redacted] + cd sho sed it up. [redacted] was not a pers friend, but merely an acquaintance.

b6  
b7C

Told [redacted] that has a ph # for [redacted] chambers, but tell me what you want to talk to [redacted] about. Mark votes in envelope (referred to envelope).

Notes refreshed her recollection: [redacted] referred by Mitchell & Tweed.

When [redacted] [redacted] of I were friends. Cove I people wanted it closed to steal software. "

b6  
b7C

~~etc.~~ [redacted] went thru alley re [redacted] [redacted] pressed [redacted] to send [redacted] to Mach. to cover I.

[redacted] called [redacted], related substance of [redacted] telecall, + advised re whether a [redacted] wanted to talk to [redacted] [redacted] said re pressure to cover [redacted] said he "had heard it,

b6  
b7C

Re concern that msg of to closing I was about software I #

[redacted] concludes that [redacted] was agreeing with other [redacted] alleg of C.D. b6 b7C

but didn't know it. " re what [redacted] had told [redacted] who told [redacted] b6 b7C  
Only thing he can't agree with, is that, [redacted] said he did not discuss it w/ [redacted]  
[redacted] said it all came from [redacted] meeting with [redacted]

[redacted] said he talked to [redacted] when he was told to send somebody down. [redacted] said we don't have standing to send anyone down. b6 b7C

[redacted] had queried [redacted] re whether [redacted] told [redacted] to send [redacted] to WDC [redacted] ans. that it may not have been anyone who passed [redacted]

[redacted] said he wd refuse to send [redacted] to black. b6 b7C

[redacted] not happy re [redacted] recantation - she repes a small creditor in UPI. [redacted] has doubts that [redacted] got UPI confused with FNSLAW.

[redacted] recently Has given info to [redacted] of Senate Sub committee on Invest'g. b6 b7C

Jash  
Spec ques of [redacted] re [redacted] (etc) b6 b7C  
1) Had [redacted] contacted [redacted] directly to send [redacted] to Wash? A: [redacted] had messaged [redacted] asked [redacted] to send [redacted] [redacted] didn't know who had asked [redacted] May not have been anyone.

3/18/87

det for - contractor  
for organizing  
prosecutors of /ies

has  
source

Will any  
asked to send

[redacted] to DC

on /uslaw case

called [redacted] about  
[redacted] call

referred  
to [redacted]

supposed to have asked  
DE/la US T'es to convert  
case to [redacted] referred  
to [redacted] US T'es

to [redacted] [redacted]

did [redacted]  
tell who asked  
him - may not [redacted]



matter referred by [redacted]  
[redacted]  
when [redacted]  
was in Justice  
[redacted]

HOLM KESSEL FRIED KESSNER & O'HARA  
THE GRAYBAR BUILDING  
420 LEXINGTON AVENUE  
NEW YORK, NEW YORK 10170

working  
for [redacted]

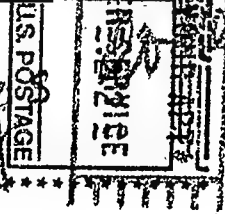
parents of [redacted]  
were friends  
of [redacted]

concern Justice  
Dept. want it closed  
heard it not known  
[redacted] to [redacted]  
[redacted] [redacted]  
[redacted] [redacted]

only  
thing  
can  
disagree  
with [redacted]

came from  
[redacted]  
disc [redacted]  
crazy thing

New York City, New York 10013



subed  
[redacted]

to [redacted]  
when [redacted]  
to [redacted]

down  
[redacted]

lost [redacted]  
standing  
[redacted]

Dep't  
for Justice

b6  
b7C

b6  
b7C

b6  
b7C

74-330-1A-5

Field File No. \_\_\_\_\_

Serial # of Originating Document

WF 74-330-1A-6

OO and File No. \_\_\_\_\_

Date Received \_\_\_\_\_

From \_\_\_\_\_

(Name of Contributor)

\_\_\_\_\_  
(Address of Contributor)

\_\_\_\_\_  
(City and State)

By \_\_\_\_\_

(Name of Special Agent)

To Be Returned ☐ Yes ☐ No    Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules  
of Criminal Procedure ☐ Yes ☐ No

Title: \_\_\_\_\_

Reference: \_\_\_\_\_

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

\_\_\_\_\_

11/3/88

b6  
b7C

b6  
b7C

PRW  
E C

302

11/3/88

b6  
b7C

[ ] exercise v. little control over NY ops.  
Bec was v. little probl w/ NY ops, [ ] use<sup>b6</sup>  
to travel to other ops. <sup>b7C</sup>  
Wd send info<sup>b6</sup> mostly re ops request.  
Occas wd send info<sup>b6</sup> re high visit cases..

Never had ~~an~~ interfer from ED re  
case request.

[ ] send [ ] to NY in approx 1 year  
to interview & learn ops request. [ ] after  
did this in new US Pres. <sup>b6</sup>  
<sup>b7C</sup>

± know [ ] prior to [ ] coming to  
NY to learn ops request. After his  
trip, [ ] wd call [ ] frequently to discuss  
cases & request.

Not sure when hist heard of T;  
believes he & [ ] discussed T as many  
matters. Recalls one situation  
where parties wanted to exclude [ ] from  
access to info. [ ] advised that as Tex  
[ ] can't allow that to happen. Urged  
him to bring notion to maintain access  
w/ security agreeable to parties. <sup>b6</sup>  
<sup>b7C</sup>

Early 1985, [ ] decided to apply to be  
[ ] Design [ ] to run office here <sup>b6</sup>  
believed he'd [ ] wanted ops control <sup>b7C</sup>

(2)

I allowed [ ] to become familiar w/ [ ]  
apps. b6 b7C

MB confers re [ ] who has [ ] had  
gone to WDC to write US Tee Manual  
prev. re Ch 11 (reorgan) which was  
not in focus of US Tee prog.

[ ] heard from someone (not recalled  
but not [ ] - not either. Was [ ]  
that [ ] wd go to WDC to work on  
I. Didn't like for 2 reasons: 1)  
[ ] needed in NY in view of [ ]  
pending depen in B & level; 2) [ ]  
for a Tee to get involved in another  
Tee's cases. b6 b7C

Sure that never discussed the [ ]  
issue with [ ] has told [ ] that if  
[ ] ever called him, to let [ ] know b6 b7C  
[ ] never did, and [ ] has never  
had any contact with [ ] re [ ]  
working on I.

[ ] relship w/ [ ] not good.  
anyway, he attempted to mediate b6 b7C  
a dispute bet [ ] & another Tee (not  
[ ] & [ ] regarded [ ] as an  
inmate.

[ ] reviewed 3/87 dep't testin'. b6 b7C  
at p. 1, ~~re~~ testin' re I list of names  
refer to sh center a spec center.  
At time, sure was I, but now, in  
light of [ ] is certain was not I, but  
rather [ ] in. Also, he there  
was unusual proc of firing spec center,  
he were advisors @ as well as  
creditors.

Renewed dep #11:  
[redacted] wd complain to [redacted] about [redacted]  
interfer in both daily ops & cases. During  
this time, Tees were constantly trying to  
~~show~~ demand their index from DOT.  
As example, [redacted] told [redacted] that IRS  
wanted VPI converted. [redacted] resisted, b6  
& IRS later was paid full value of b7C  
indebtedness. [redacted] denies telling [redacted] this,  
but [redacted] is sure that [redacted] told him.  
But no recollection that [redacted] was  
involved in IRS measure. [redacted] sure that  
he confused [redacted] conficts re ~~dep~~ 2.  
measures from [redacted] w/ IRS measure as  
[redacted] to convert VPI.

Re recantation: Prior to depo, traded  
phone calls, but can't link up.

Immed after depo, called [redacted] told  
him re depo, & [redacted] jogged memory re b6  
I + VPI. [redacted] readily agreed, & b7C  
realized that he had confused the two.

Doesn't agree re [redacted] re [redacted] situation,  
re [redacted]

Called [redacted] re what to do.  
When gave testin, thought it was the  
truth. [redacted] worked as affid  
together, created record as far as [redacted]  
concerned, & [redacted] signed. b6  
b7C

~~And~~ Only had contact w/ [redacted]  
re depo testin, & that wd prepare  
affid. to correct record.

Adds paren that his recantation is  
not that big an issue. First, his career  
w/ [redacted] re measure from [redacted] was merely  
hearsay; 2<sup>d</sup>, even if it happened, is not  
sig, b/c US Tee can do no more  
than return to [redacted] of re correct. An  
affid as reflected in his

b6  
b7C

is a probab that such notin' w/ denied. Esp hee [redacted] had considered him US Tee's access to info.

Re 2<sup>d</sup> dep, 41 - ~~sub-earlier~~ his testis. Re curves w/ [redacted] discussed w/ him [redacted] desire to depose him re info re I case. Told [redacted] of have much info, & was guid thru series of med tests re prostate condition as ~~not~~ so wanted to expedite I matters. Realizes sd have spend more time reviewing facts, but preoccup w/ med probs, esp suri board surg.

Re 44-45 of 2<sup>d</sup> dep; altho agrees w/ [redacted] re I, disagree ~~that~~ w/ [redacted] re [redacted] issue - still believes that [redacted] told him re [redacted] plans to [redacted] [redacted] to Wash.

Valid dep #2 + trial.

Re Baym's article, [redacted] recalls that [redacted] asked [redacted] to support his applic as AUS Tee. ~~TS called [redacted] [redacted] did~~ & send it to DOJ. ~~TS called [redacted] [redacted] did~~ not know of [redacted] involvement w/ I matter. [redacted] called [redacted] & asked him to recap. [redacted] at a soc hunc at [redacted] home, had several curves w/ [redacted] re variety of issues. ~~to [redacted]~~ told [redacted] that the med probs w/ [redacted] hee he had disclosed issues off birds being used in unauth manner. Therefore, his appt wld up. Recalls telling him that just tell truth & every thg w/ O.K. Told [redacted]

was sorry for way things were turning out.  
But spec denies any career w/ [redacted]  
where [redacted] apol to [redacted] re [redacted]  
involvement. Says no reason to apol.

b6  
b7C

Re Burran's article, disagrees with  
article, which infers that [redacted] does not  
disagree w/ [redacted] [redacted] meant that  
he had no probt w/ [redacted] story, he kept  
no info either way - [redacted] was never  
privy to [redacted] careers.

b6  
b7C

Re [redacted] incident: [redacted] called &  
asked if he cd get help or support. [redacted] Albarran  
position: [redacted] wrote letter to aid [redacted]  
[redacted] agreed wd write to AG, & have it  
filed down to [redacted] Does not remember  
ever disc I - altho may have disc  
[redacted] interper w/ EO ok. But I was  
not told this from my vid. ~~conversations~~  
not at [redacted] [redacted] [redacted]

b6  
b7C

No careers. re I.

[redacted] [redacted] careers; she called  
before first dep, to see if [redacted] wd talk to  
[redacted] Recalls telling her same story  
as in first dep, i.e. that [redacted] had  
measures on him & ~~first case~~ careers I.  
But that was before first dep.

b6  
b7C

[redacted] has seen [redacted] at several social  
& prof events. Suly of I & [redacted] never  
came up; had it done so, [redacted] wd have  
walked away, hee has had bill of I.

b6  
b7C

Interview by [redacted]

Counsel in Surg TT



74-330-1A-6

2

Field File No. 74-330

Serial # of Originating Document \_\_\_\_\_

OO and File No. \_\_\_\_\_

Date Received \_\_\_\_\_

From \_\_\_\_\_  
(Name of Contributor)

\_\_\_\_\_  
(Address of Contributor)

By  (State)  
(Name of Special Agent)

To Be Returned ☐ Yes ☐ No      Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules  
of Criminal Procedure ☐ Yes ☐ No

Title:   
POSSIBLE PERJURY  
OO: WMAFD

Reference: \_\_\_\_\_  
(Communication Enclosing Material)

Description: ☐ Original notes re interview of

Investigative Notes

74-330-151

[redacted] } Perjury  
Perjury

b6  
b7C

INSLAW - attys [redacted]

HADRON

[redacted]

1. [redacted]
2. [redacted]
3. [redacted]

US Trustees

b6  
b7C

\*  
subs  
\*

[redacted]

Alleg of Perjury

① [redacted] info re pressure on [redacted] was accurate &  
+ [redacted] covered up; [redacted]

b6  
b7C

② If [redacted] orig story re pressure [now claims true] is true, then committed perjury at trial re recant.

OOJ - not pursued

8

Field File No. 74-330

Serial # of Originating Document \_\_\_\_\_

OO and File No. \_\_\_\_\_

Date Received \_\_\_\_\_

From \_\_\_\_\_  
(Name of Contributor)

\_\_\_\_\_  
(Address of Contributor)

By \_\_\_\_\_ State)  
(Name of Special Agent)

To Be Returned ☐ Yes ☐ No      Receipt Given ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules  
of Criminal Procedure ☐ Yes ☐ No

Title: \_\_\_\_\_

POSSIBLE PERJURY  
OO:WMFO

Reference: \_\_\_\_\_  
(Communication Enclosing Material)

Description: ☐ Original notes re interview of

Investig Notes

b6  
b7C

b6  
b7C

## OUTLINE

- I Bkgd of INS. <sup>relationship &</sup> BR litig.
- II [ ] <sup>meets w/</sup> [ ]  
[ ] allegations
- III Testim of other Lbs under oath & trial
- IV Judgment & Findings
- ~~REDACTED~~
- V INSL req investig  
DOJ auth investig ation
- DE Analyzed by [ ]
- VI Leads

b6  
b7C

DOT

1. Ref 3/17/88 a lth [redacted] 1 dr dr [redacted]

a. p. 5 - Where [redacted] ass'd?

b6  
b7C

b. "✓ Where [redacted] notes of  
[redacted] report re [redacted]  
stand to [redacted]

c. " - [redacted] notes re report of  
[redacted] re [redacted] shirts.

b6  
b7C

d. " - [redacted] notes re shirt  
of [redacted] to [redacted]  
on 3/24/87

2. <sup>Pb - + testimony</sup>  
a. Notes of INS. engr [redacted] re telcal<sup>b6</sup>  
from [redacted] re conversion to Chr 7. <sup>b7C</sup>

2. Check on [redacted] testimony re [redacted]  
calls to [redacted] immediately after [redacted] dep<sup>s</sup>  
[redacted] next day).

b6  
b7C

3. Need [redacted] testimony re "11-7" note [NEXIS  
p 51]

DOJ APPEAL BRIEF

291

[ ] et held that [ ] alleged efforts  
to have [ ] file a motion to compel I<sup>b6</sup>  
[ ] [ ] state to [ ]<sup>b7C</sup>

+ [ ]  
C INS LAW Exp'r) wd not make it in ch 11  
+ [ ] consider input w/ DOJ.

2/7/85- INSLAW files in BR ~~up~~ cl 11

6/10/86- INSLAW files copied in BR & vs DOJ

3/17/87- [ ] met w/ [ ] & CUNIFF  
in bldg. [ ] said [ ] claimed pressured by [ ]  
[ ] to conceal or dismiss INSLAW BR prob.<sup>b6 b7C</sup>

3/26/87- [ ] depor.; denied would re  
measure to conceal/dismiss INS BR prob.<sup>b6 b7C</sup>

6/1-2/87- [ ] testim in BR court.  
Recanted testi re

12/18/87- DOJ/OPR recomm hr DAG to hire [ ]<sup>b6 b7C</sup>

6/4/88- [ ] resigns per agrmt [ ]  
[ ]<sup>b6 b7C</sup>



alt → letter, 3/17/88

b6  
b7C

1. 3/25/87 depo: told him pressured  
to convert I

2

Interview

a) Did tell on 3/18/87

b) " " " sure dep b6  
b7C

c) " " " 3/20/87

d) " " " 3/24/87

Inter 3

2/18/85 - DOJ officer  
telecall w/ Notes say " talked to  
" No way " will be 7. "

b6  
b7C

✓ testimony 4. INSLAW notes/testim  
that o/a 2/18 advised that "we  
talked to the Tees - no " but wba 7".

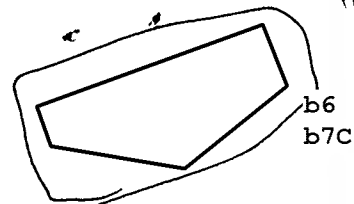
b6  
b7C

✓ testimony 5. 2/85 notes of notes re possible  
conflicts

b6  
b7C

Inter  
6. 7/11/87 covers at house between  
tells that telling  
notly; that recanted to make it easier;  
that told that had confused  
w/ another case.

[redacted] ed al



(74-330)






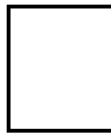
5 ER

1. 5/2/88 - Memo, AAG Crim → Dir: Reg. in Inv.
2. 5/11/88 - A/T, HQ → WFO, reg. invest.
3. 5/18/88 - Memo, PTR → File re DOJ contact; ~~re DOJ~~ b6 b7C
4. NEXIS Search - sub D
5. 7/25/88 - Memo, PTR → File re OPR contact
6. 7/28/88 - Memo, RDC → File re reassg. to PRW
7. 9/8/88 - Newspaper clipping chg out
8. 8/18/88 - Insert, PRW, re mtg w/ [redacted] DOJ
9. 9/9/88 - LHM
10. 9/9/88 - A/T, WFO → HQ re update
11. 9/22/88 - T/T, WFO → Dir re [redacted] testm to Senate b6 b7C
12. 9/13/88 - 302, [redacted] OPR
13. 9/20/88 - 302, [redacted] OPR
14. 9/20/88 - 302, [redacted] DOJ
15. 10/8/88 - T/T, WFO → HQ, NY
16. 9/15/88 - INSERT re mtg w/ DOJ AHy [redacted]
17. 10/7/88 - T/T, same as #15
- 17a. 10/24/88 - 302, [redacted] US Tre b6 b7C
18. 10/11/88 - Pub Corrup Data Form
19. 10/14/88 - INSERT re mtg w/ DOJ AHy [redacted]
20. 10/19/88 - 302, WM [redacted]
21. 10/20/88 - 302, [redacted] AUSA
22. 10/20/88 - 302, [redacted] US Ci J.
- 23.



b6  
b7C

## THINGS TO DO

- ✓ 1. Insert
- ✓ 2. Confirm prosec opin to DOJ
3. Review transcr/docum
4. Await DOJ letter to  via atty 
5. Set leads re interv of   
 ✓ re authority
- ✓ 6. Contact DOJ/OPR re memos/notes of inter  
w/  etc.
- ✓ 7. Create sub files for testin of ea  
subject & media articles.
- ✓ 8. A/T to HQ
9. TT to Bureau re awaiting  testimony

b6  
b7C

b6  
b7C

~~CONFIDENTIAL~~  
~~NOT C-11~~  
~~THY C-5~~  
C-2

TRANSMIT VIA: Airtel

CLASSIFICATION: \_\_\_\_\_

DATE: 5/11/88

FROM: Director, FBI

TO: SAC, WMFO

[Redacted]

[Redacted] PERJURY;  
OO: WMFO

b6  
b7C

Enclosed for WMFO is a copy of a self-explanatory memorandum from [Redacted] Acting Assistant Attorney General, requesting that the FBI conduct an investigation into allegations of [Redacted]

WMFO is requested to have the assigned case Agent promptly contact Departmental Attorney [Redacted] Public Integrity Section, at [Redacted] and keep FBIHQ informed of all pertinent developments.

Enclosure

11

GENERAL INDEXED	[Redacted]
<input checked="" type="checkbox"/> Admin. & Search	[Redacted]
<input type="checkbox"/> [Redacted]	[Redacted]

b6  
b7C

74-330-2

[Redacted]

[Redacted]

[Redacted]

[Redacted]

FBI/DOJ

MEMORANDUM

To: SAC, WMFO (74-330) (P) (C-2)

Date: May 18, 1988

From: SA [redacted]

b6  
b7C

[redacted]  
POSSIBLE PERJURY;  
OO: WMFO

Re DOJ Criminal Division memo from Acting AAG JOHN C. KEENEY to FBIHQ dated 5/2/88 titled "Request for Investigation: Allegations by INSLAW".

b6  
b7C

On 5/17/88, SA [redacted] met with DOJ/PIS Attorney [redacted] who provided overview information as follows:

INSLAW received a DOJ computer software contract through DOJ procurement rather than GSA procurement at a time when INSLAW had no other client base beyond DOJ. It is not clear how, why, or through whom INSLAW landed the contract, but by 1983, their performance was found unsatisfactory within DOJ. [redacted] noted that she personally had heard comments from a non-DOJ statistical expert before the INSLAW situation became an issue that their work was not considered good when they were performing on a not-for-profit basis under LEAA funding. Further, former AAG D. LOWELL JENSEN had a "long-standing dislike" for INSLAW from his days as a D.A. in Alameda County, California, where the prosecutors' office had case tracking software on-line. JENSEN's criticism of INSLAW was set forth in a book he wrote on the subject published in 1980--again long before the current INSLAW allegations became an issue.)

b6  
b7C

INSLAW apparently looked at the \$40 million PROMIS contract as a leg up to bigger DOJ projects. Even Judge BASON, who ruled in favor of INSLAW in its civil suit against the DOJ, conceded that INSLAW was in partial performance default under its contract.

On or about 4/20/83, INSLAW owner WILLIAM HAMILTON was telephoned by [redacted] Chairman of HADRON CORP., saying he planned to buy INSLAW. HAMILTON claims that when he told [redacted] he was not interested in selling, [redacted] told him he had ways to make him sell. HADRON becomes pertinent insofar as [redacted] a part-owner of HADRON and its wholly owned subsidiary ACUMENICS, is a friend of [redacted] was still a White

b6  
b7C

2-WMFO

74-330-13

SEARCHED	INDEXED
SERIALIZED	FILED
MAY 19 1988	
FBI - WASH. FIELD OFFICE	

House advisor in 1983 [redacted]

b6  
b7C

[redacted] ACUMENICS later received a \$40 million software contract servicing the DOJ Lands Division--not PROMIS--after INSLAW was found unsatisfactory.

With virtually no other client base besides DOJ, INSLAW filed for bankruptcy protection around February, 1985. INSLAW also filed a second action in civil court--ancillary to the bankruptcy--suing DOJ for damages. That case was filed and heard in 1986. The bankruptcy matter was ruled on in February, 1987. In an unusual manner, the bankruptcy court viewed the civil suit inseparable from the bankruptcy matter and heard them together. Much of the possible perjury comes out of the suit rather than the bankruptcy proceeding.

In his ruling, Judge BASON did not go so far as using the word "lied," but his opinion incorporates phrasing such that he found some of the testimony incredible and utterly unbelievable. BASON made no criminal referral for perjury, though, as far as [redacted] is aware. BASON was not reappointed to the bankruptcy bench shortly after the ruling, and he filed litigation against the District Court judges over their failure to reappoint him. His case was dismissed.

b6  
b7C

BASON's successor, Judge MARTIN TEEL, JR., has yet to set the amount of punitive damages against DOJ in the civil suit. INSLAW, meanwhile, is appealing its bankruptcy liquidation in U.S. District Court before Judge WILLIAMS B. BRYANT.

Based on Judge BASON's opinion, DOJ OPR began an

[redacted]

b6  
b7C

[redacted] had a long history of in-office frictions between him and his boss. [redacted] At some point,

[redacted] believes [redacted] has been contacted by staffers of Sen. SAM NUNN who is planning a committee hearing. Sens. RUDMAN and DODD also are interested in conducting hearings.

b6  
b7C

The issue of perjury focuses on whether or not [redacted] attempted to exert undue influence on the trustees assigned to

INSLAW's bankruptcy to convert or liquidate. [ ] has consistently denied attempting to influence the trustee's decision. The only other witness whose testimony has been consistent is the trustee himself, [ ] out of the Alexandria U.S. TRUSTEES field office. [ ] was the one assigned to handle INSLAW's bankruptcy. [ ] was Trustee then at the New York field office. At some point, [ ] directed [ ] assistant, [ ] to be detailed from New York to assist on the INSLAW case. There is confusion as to whether [ ] was supposed to go to Alexandria to work with [ ] directly or to go to the EXECUTIVE OFFICE OF U.S. TRUSTEES in D.C. [ ] contends he wanted [ ] at the EXECUTIVE OFFICE. [ ] apparently understood the detail was to Alexandria. Judge BASON apparently construed that [ ] wanted to hand pick someone [ ] he could direct. At some point during deposition, [ ] said [ ] did suggest conversion or dismissal of INSLAW's bankruptcy in discussing [ ] possible reassignment. In court, [ ] testified there was no pressure from [ ] as did [ ]

b6  
b7C

[ ] shares [ ] view that [ ] is an abrasive personality. [ ] met yesterday (5/16/88) with [ ] at which time she told him [ ] is a subject of this criminal perjury investigation. [ ] is the only one who has been informed by [ ] so far that he is a subject. [ ] said [ ] position is that his full current recollection of events is what is on the record. [ ] will consider reviewing anything that might refresh his memory. He has no particular reason to lie for [ ] and he will consent to an interview. [ ] expressed a preference to have [ ] interview [ ] but was agreeable to interview by the FBI. [ ] currently is being scheduled for interview by NUNN Committee staffers.

b6  
b7C

INSLAW owners [ ] have alleged obstruction of justice in addition to perjury. The obstruction hinges on what they say was interference in their right to counsel. (This issue was the focus of a story by reporter RITA BRAVER on the CBS EVENING NEWS last week.) Attorney [ ] was fired from his law firm, [ ] while representing INSLAW. He told the [ ] he was fired for failure to control the client--INSLAW. [ ] believed one of the firm's senior partners, [ ], was responsible and that [ ] did it in retaliation for naming [ ] in the civil suit. [ ] was [ ] personal attorney in 1984 (and represented [ ] in a matter involving [ ] which [ ] friend and investment trustee [ ] is of counsel to the DICKSTEIN SHAPIRO firm. [ ] absolutely denied any DOJ influence in his decision to dismiss [ ]. He denied having any conversation at all with [ ] about [ ]--as was alleged apparently. [ ] could not recall what [ ] may

b6  
b7C

have said concerning any discussions with [ ]

Both Judge BASON and [ ] have approached Special Prosecutor [ ] to bring these issues into [ ] investigation of [ ] determined the INSLAW issues are unrelated to the matters of his investigation and would not add them.

b6  
b7C

[ ] was assigned in late February, 1988, to handle the evidence review necessary to determine whether a separate independent counsel should be requested for the INSLAW allegations stemming from "Inslaw, Inc. v. United States of America and the United States Department of Justice". That sort of preliminary inquiry was under a 15-day deadline to determine whether there was enough factual evidence to warrant a special prosecutor. [ ] did not find sufficient factual evidence to recommend such a request. On the fifteenth day, however, INSLAW's attorneys-- [ ] --came to [ ] to press for a perjury investigation of [ ] independent of what OPR was doing.

b6  
b7C

Former AAG WILLIAM WELD signed the finding, accepting [ ] recommendation not to go to an independent counsel on the questions raised concerning both obstruction of justice and perjury. [ ] recommended pursuing a criminal perjury investigation against [ ] based on [ ] admission. [ ] did not recommend pursuing a criminal OOJ investigation based on [ ] wholesale denial.

b6  
b7C

[ ] were interviewed by OPR. [ ] decision was forwarded to OPR with a caveat that any additional information developed be furnished to this criminal investigation.

[ ] advised on 5/16 when contacted by telephone to set an appointment with SA [ ] that she had not thought about notifying Judges BRYANT and TEEL of this perjury investigation. During the meeting on 5/17, [ ] inquired whether judicial notification was only an FBI policy or what. [ ] was shown a copy of MIOG Part I, 74-2.1.3 concerning FBI policy which may or may not emanate from AG Guidelines. [ ] advised she wanted to ask around at DOJ before determining whether she would notify the two judges. This situation was brought to the attention of SSA [ ] FBIHQ, on 5/17/88 who will be advised if [ ] determines against notifying the judges.)

b6  
b7C

[ ] furnished copies of the following documents for SA [ ] to review:

- a. Non-confidential version of Judge BASON's opinion in the bankruptcy/civil suit proceeding;



- b. Letter summarizing allegations dated 2/12/88 from [redacted] to [redacted] Deputy Chief, PIS, DOJ;
- c. Affidavit of [redacted] dated 3/26/87;
- d. Deposition of [redacted] taken 3/25/87;
- e. Deposition of [redacted] taken 5/22/87;
- f. Court transcript pages 653-728 of testimony of [redacted] (undated);
- g. Deposition of [redacted] taken 3/23/87;
- h. Deposition of [redacted] taken 4/27/87;
- i. Deposition of [redacted] taken 3/23/87;
- j. Deposition of [redacted] taken 3/26/87;
- k. Court transcript of pages 311-368 of testimony of [redacted] (undated);
- l. Memo dated 12/18/87 from [redacted] OPR, to ARNOLD I. BURNS, Deputy AG, re Allegations of Misconduct on the Part of [redacted]
- m. Letter dated 3/17/88 from Attorney [redacted] to ARNOLD I. BURNS, Deputy AG, re [redacted]

b6  
b7C

b6  
b7C

b6  
b7C

LEADS:

WMFO at Washington, D.C.:

1. Will obtain assurance from [redacted] that Judges BRYANT and TEEL are both notified of the allegations and are agreeable to this perjury investigation.
2. Will review the above listed documents.
3. Will contact [redacted] and/or [redacted] at OPR [redacted] for a list of all individuals interviewed to date in connection with this matter and the results of interviews. Will also obtain from OPR copies of depositions/affidavits/transcripts beyond those provided by [redacted]
4. Will interview [redacted] and request his submission to FBI polygraph examination.

b6  
b7C

File - Serial Charge Out  
FD-5 (Rev. 6-17-70)

File 74 330 Date 9-14-88  
Class. Case No. Last Serial

☒ Pending

☐ Closed

Serial No.

Description of Serial

Date  
Charged

4 Permanent Charge out  
of NEXIS computer  
search dt 9-8-88  
to 74-330 sub D

9-8-88

*[Signature]*

Supv

Employee

RECHARGE

Date \_\_\_\_\_

To \_\_\_\_\_ From \_\_\_\_\_

Initials of  
Clerk {

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date {

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Date charged

\_\_\_\_\_  
Employee

\_\_\_\_\_  
Location

# Memorandum



To : SAC, WMFO (74-330) (P)

Date 7/28/88

From : SSA [redacted] (C-2)

Subject :



POSSIBLE PERJURY;  
OO:WMFO

b6  
b7C

On 7/22/88, writer was telephonically contacted by [redacted] Trial Attorney, Public Integrity Section (PIS), U.S. Department of Justice, telephone [redacted] regarding captioned matter. After identifying himself, [redacted] stated he had been reassigned the INSLAW investigation. [redacted] advised writer he had been informed by SA [redacted] that captioned matter was to be reassigned due to her current work load and [redacted] was inquiring as to when he might expect to be contacted by the new case agent. Upon being questioned by the writer as to his prosecutive opinion regarding captioned matter, [redacted] responded it was a "unlikely case, as a case to be made, however, it's something that has to be done and needs to be done with some promptness." Writer informed [redacted] he had requested a summary memorandum from SA [redacted] and was in the process of reviewing that material for reassignment to another agent.

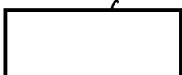
Q b6  
b7C

On 7/27/88 writer telephonically recontacted [redacted] and informed him captioned matter would be reassigned to SA [redacted] who was reporting to Squad C-2 effective 8/15/88. Writer assured [redacted] that SA [redacted] would make his initial contact with him during the week of 8/15/88. [redacted] agreed to that time frame and stated there was nothing within the case which required handling prior to that date.

11/10/88  
b6  
b7C

✓-WMFO

b6  
b7C



Reassign  
SA [redacted]  
7/28/88  
[redacted]

74-330 6

SEARCHED	INDEX
SERIALIZED	FILED
JUL 28 1988	
FBI - WMFO	

74-330 8

SEARCHED	INDEXED
SERIALIZED	FILED
SEP 08 1988	
FBI - WASH. FIELD OFFICE	

b6  
b7C

WMFO 74-330

[redacted] [redacted]  
[redacted] On August 18, 1988, Special Agent (SA) [redacted]  
[redacted] C-2, WMFO, met with DEPARTMENT OF JUSTICE (DOJ),  
Public Integrity Section (PIS), Attorney [redacted]  
in regard to subject case.

b6  
b7C

The facts of the case were discussed generally. The problem with the case is keeping it narrowly focused on the issue of perjury, since there are other aspects (e.g.) Congressional hearings; civil appeal, etc.). However, the PIS/FBI interest focuses on the perjury/subornation of perjury allegations. Subject [redacted] has previously testified that he had fabricated the information about a conspiracy to injury INSLAW. However, he has recently made out of court allegations, as has his attorney, that there was a conspiracy to liquidate or otherwise injury INSLAW.

b6  
b7C

It was discussed with [redacted] that even if [redacted] recants his prior testimony and realleges a conspiracy to damage INSLAW, thereby raising perjury allegations, the case against him, and subjects [redacted] may be difficult to prove, since his [redacted] credibility would be seriously questioned, and there may be no other witnesses to this alleged conspiracy.

But if [redacted] implicates other subjects, and passes an FBI polygraph, and other evidence indicates the existence of perjury or subornation of perjury, [redacted] advised that the Public Integrity Section will strongly consider prosecution.

b6  
b7C

It was discussed and agreed that the following investigative actions will be taken initially:

1. FBI
  - a. Complete transcripts/document analysis.
  - b. Interview [redacted] (by his attorney [redacted]) The attorney will probably request immunity for his client; we will then request a proffer of expected testimony and require a consent to a polygraph subsequent to interview.

- c. Set leads to interview U.S. COURT OF APPEALS [redacted] regarding whether [redacted] said anything to them regarding pressure by [redacted] et al to liquidate INSLAW.
  - d. Contact DOJ/OPR regarding memos or notes of their interviews with [redacted] or relevant persons.
  - e. Prepare a confirmatory letter to DOJ regarding this meeting and DOJ'S prosecutive opinion.
2. DOJ
- a. Will contact DOJ Office of Legislative Affairs(OLA) to insure that we are advised of scheduled congressional testimony regarding INSLAW by the subjects or other relevant persons.
  - b. Will write [redacted] attorney [redacted] regarding whether his client will agree to submit to an FBI interview and polygraph.

b6  
b7C

b6  
b7C

File - Serial Charge Out  
FD-5 (Rev. 6-17-70)

File 74 330 Date 9/15/88  
Class. Case No. Last Serial

☒ Pending

☐ Closed

Serial No.

Description of Serial

Date  
Charged

7

Permanent charge

9-8-88

Out of newspaper

clipping dt 8-12-88

to 74-330 SUB D

A

supv

Employee

RECHARGE

Date \_\_\_\_\_

To \_\_\_\_\_ From \_\_\_\_\_

Initials of  
Clerk {

Date {

Date charged \_\_\_\_\_

Employee \_\_\_\_\_

Location \_\_\_\_\_

Washington Metropolitan  
Field Office  
September 9, 1988

[REDACTED]

POSSIBLE PERJURY

b6  
b7C

The predication for this investigation was a complaint made by attorneys for INSLAW, INC., a former contractor for the Department of Justice, to the Department of Justice Public Integrity Section on or about February 26, 1988. The complaint alleged that former [REDACTED] and former [REDACTED] perjured themselves in testimony regarding bankruptcy proceedings involving INSLAW, and that subsequently [REDACTED] suborned [REDACTED] perjury. Central to the allegations are deposition and/or trial testimony on two matters: First, whether [REDACTED] pressured [REDACTED] to convert the INSLAW bankruptcy from a Chapter 11 (reorganization) to a Chapter 7 (liquidation) case; and second, whether [REDACTED] pressured [REDACTED] to send his [REDACTED] from New York to Washington, D.C. to work on the INSLAW case.

b6  
b7C

On May 2, 1988, Acting Assistant Attorney General John C. Keeney, Criminal Division, requested that the Federal Bureau of Investigation open a criminal investigation on the allegations. On May 17, 1988 the facts of this case were discussed generally between Public Integrity Section Attorney [REDACTED] and FBI Special Agent [REDACTED]

b6  
b7C

On August 18, 1988, this case was further discussed between Public Integrity Section Attorney [REDACTED] and FBI Special Agent [REDACTED]. In addition to going forward with the perjury investigation of [REDACTED] and [REDACTED] requested that the investigation also focus on the testimony of [REDACTED]

4-Bureau  
✓ 2-WMFO  
1-Public Integrity Section, Criminal Division, DOJ  
Attention: [REDACTED]

[REDACTED]

( )

74-330 9

SEARCHED	INDEXED
SERIALIZED	FILED
SEP 14 1988	
FBI - WASHINGTON	

[REDACTED]

b6  
b7C



WMFO 74-330

[redacted] who has previously testified that he fabricated information about a conspiracy to injure INSLAW. However, he has recently recanted and made out of court allegations, as has his attorney, that there was a conspiracy to liquidate or otherwise injure INSLAW.

b6  
b7C

In view of proposed hearings by the Senate Permanent Subcommittee on Investigations, [redacted] agreed to contact the Department of Justice Office of Legislative Affairs (OLA) to insure that Public Integrity and the FBI are advised of scheduled Congressional testimony by the subjects or other relevant persons regarding the INSLAW matter.

AIRTEL

9/9/88

TO: DIRECTOR, FBI  
ATTN: PUBLIC CORRUPTION UNIT,  
WHITE COLLAR CRIMES SECTION

FROM: SAC, WMFO (74-330) (P) (C-2)

[REDACTED]  
POSSIBLE PERJURY;  
OO:WMFO

b6  
b7C

Enclosed for the Bureau are the original and three copies of an initial letterhead memorandum regarding subject case.

For the information of the Bureau, WMFO has received from the Public Integrity Section, Department of Justice, extensive transcripts of deposition and trial testimony of the subjects and other relevant persons involved in the INSLAW bankruptcy case. These transcripts are currently being reviewed and extracted into digest format. Once this is accomplished and inconsistent and possibly perjurious testimony is identified, further leads will be set.

Public Integrity Section attorney [REDACTED] discussed with WMFO case Agent that even if subject [REDACTED] recants his prior testimony and now alleges a conspiracy to injure INSLAW (thereby raising perjury allegations as to himself and the other subjects) the case would be very difficult to prove since [REDACTED] credibility would be seriously in question and the other testimony is virtually uniformly consistent that there was no conspiracy to injure INSLAW. However, if [REDACTED] implicates other subjects, passes an FBI polygraph, and other evidence indicates the existence of perjury or subornation of perjury, [REDACTED] advised that the Public Integrity Section will consider prosecution.

b6  
b7C

2-Bureau (Enc. 4)  
2-WMFO (74-330) (Enc. 2)

[REDACTED]  
(4)

74-330

b6  
b7C

10

[REDACTED]	[REDACTED]
[REDACTED]	

WMFO 74-330

[ ] has advised WMFO case Agent that the DOJ Civil Division brief filed on 6/17/88 in the appeal of the adverse judgment against DOJ in the INSLAW case contains a statement referring to a criminal investigation concerning the veracity of subjects [ ] in their testimony. [ ] advised that this statement in the brief satisfies the requirement that the judge be informed of the criminal investigation (MIOG Part I, Para. 74-2.1.3). [ ] further stated that there is no requirement to make particularized notification to the U.S. Bankruptcy Court, Washington, D.C.

b6  
b7c

LEADS

WMFO AT WASHINGTON, D.C.

Will review and extract pertinent portions of deposition and trial testimony prior to setting additional leads.

74-330 13

Searched	
Serialized	
Indexed	
Filed	

b6  
b7C

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/21/88

1

[redacted] was telephonically contacted at his place of employment in Reston, Virginia. After being apprised of the interviewing agent's identity, he was advised that the purpose of the interview was to discuss possible inconsistent statements of [redacted]

b6  
b7C

[redacted] advised that he was formerly assigned to the [redacted] United States Department of Justice. In that capacity, he was an attorney working on the INSLAW civil matter.

He advised that [redacted] is a private practice attorney in New York, who is a friend of [redacted]. He believes that INSLAW tried to retain [redacted] to discuss with [redacted] the Department of Justice contract and pressure on the United States trustees, both subjects for which [redacted] might have some information. [redacted] feels that [redacted] may have told about pressure on the United States Trustees to convert the INSLAW case to a liquidation, because that is what he believed at the time.

b6  
b7C

Shortly thereafter, at his deposition, [redacted] again referred to this pressure. However, he later learned he had the wrong case (e.g. he referred to a "share holder's committee", when in fact there was none with INSLAW, because it was a privately held corporation). Once he realized his mistake, he recanted his testimony by submission of an affidavit the day after his testimony.

[redacted] stated that once he learned of [redacted] deposition testimony he called [redacted] attorney about the discrepancy. He wanted to know from this attorney if [redacted] was telling the truth, that there had been no conspiracy to liquidate INSLAW. [redacted] attorney advised [redacted] that [redacted] was telling the truth and that [redacted] was mistaken. [redacted] did not request [redacted] attorney or [redacted] to contact [redacted]

b6  
b7C

[redacted] then called Assistant United States Attorney (AUSA) [redacted] of the Southern District of New York. [redacted] had represented [redacted] at his deposition. [redacted] advised that he had spoken with [redacted] attorney, and that [redacted] was consistent in his story, and that [redacted] was mistaken. [redacted] believes that thereafter [redacted] spoke with [redacted] concerning [redacted]

b6  
b7C

Investigation on 9/20/88 at Washington, D.C. File # WMFO 74-330  
by SA [redacted] Date dictated 9/21/88

Continuation of FD-302 of \_\_\_\_\_, On 9/21/88, Page 2\*

testimony, and \_\_\_\_\_ came to realize that he had confused the INSLAW case with another bankruptcy matter. Thereafter, \_\_\_\_\_ filed his recanted affidavit with the court.

\_\_\_\_\_ also recommended that interviewing Agent discuss this matter with former DOJ Attorney \_\_\_\_\_ who has also interviewed \_\_\_\_\_ in this matter.

b6  
b7c